

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:) NO: 23-44176
) CHAPTER 13
Bobbie Hemphill,) Hearing Date: 3/7/2024
) Hearing Time: 11:00 a.m.
Debtor.) Courtroom: 7 North

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

Comes now Diana S. Daugherty, Standing Chapter 13 Trustee,
and states as follows:

1. Debtor did not file 2022 U.S. and State income tax returns.

[11 U.S.C. § 1325(a)(9); § 1308]

a) Claim #4 of the IRS includes estimated tax liability for 2022
and the Missouri Dept. of Revenue has a pending motion to dismiss
for Debtor's failure to file a 2022 Missouri income tax return.

2. The first amended plan is not feasible in that:

a) It will not pay priority claims in full.

b) The non-government claims bar date passed on 1/29/24. Based on
presently allowed claims, the base of the first amended plan is
approximately \$7,943 short of being feasible.

WHEREFORE, the Trustee prays that the Court deny confirmation of
Debtor's First Amended Chapter 13 Plan; and for such other relief
as this Honorable Court deems necessary and just under the
circumstances.

Respectfully Submitted,

/s/ Joseph M. Wilson
Diana S. Daugherty
Chapter 13 Trustee
Joseph M. Wilson
FED#51849MO; MO#51849
Attorney For Trustee
P.O. Box 430908
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(314) 781-8100
(314) 781-8881 (fax)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court on the 15th day of February, 2024, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below, on the 15th day of February, 2024:

Bobbie Hemphill
12105 Monter Dr.
Bridgeton, MO 63044

/s/ Joseph M. Wilson